

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:)	Chapter 11
)	
JOANN INC., <i>et al.</i> , ¹ ,)	Case No. 25-10068 (CTG)
)	
)	(Jointly Administered)
Post-Confirmation Debtor.)	
)	Objections due by: August 8 at 4:00
)	p.m.
)	Hearing Date: August 14, 2025 at 10:00
)	a.m.
)	

**NOTICE OF MOTION OF MARIA MARGARITA AGUILAR MARTINEZ
FOR RELIEF FROM THE PLAN INJUNCTION**

TO: Joann Inc., *Post Confirmation Debtor*

Patrick J. Reilley
Cole Schotz, P.C. *Counsel to the Post-Confirmation Debtor*

James E. O'Neill
Pachulski Stang Ziehl & Jones LLP, *(Former) Counsel to the Committee*

Malcolm M. Bates
Office of the United States Trustee

Maria Margarita Aguilar Martinez ("Movant"), by and through her counsel, has filed a Motion for Relief from the Plan Injunction ("Motion") which seeks, *inter alia*, the following relief: relief from the Plan Injunction to pursue a personal injury claim in California.

A HEARING ON THE MOTION WILL BE HELD ON AUGUST 14, 2025 AT 10:00 A.M. BEFORE THE HONORABLE CRAIG T. GOLDBLATT, UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE, 824 MARKET STREET, 3RD FLOOR, COURTROOM NO. 7, WILMINGTON, DE 19801.

You are required to file a response (and the supporting documentation required by Local Rule 4001-1(e)).

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor's federal tax identification number, are: JOANN Inc. (5540); Needle Holdings LLC (3814); Jo-Ann Stores, LLC (0629); Creative Tech Solutions LLC (6734); Creativebug, LLC (3208); WeaveUp, Inc. (5633); JAS Aviation, LLC (9570); joann.com, LLC (1594); JOANN Ditto Holdings Inc. (9652); Dittopatterns LLC (0452); JOANN Holdings 1, LLC (9030); JOANN Holdings 2, LLC (6408); and Jo-Ann Stores Support Center, Inc. (5027). The Debtors' mailing address is 5555 Darrow Road, Hudson, Ohio 44236.

At the same time, you must also serve a copy of the response upon Movant's attorney:

Christopher D. Loizides
LOIZIDES, P.A.
1225 King Street, Suite 800
Wilmington, DE 19801
Telephone: (302) 654-0248
Email: loizides@loizides.com

The hearing date specified above may be a preliminary hearing or may be consolidated with the final hearing, as determined by the Court.

The attorneys for the parties shall confer with respect to the issues raised by the Motion in advance for the purpose of determining whether a consent judgment may be entered and/or for the purpose of stipulating to relevant facts such as value of the property, and the extent and validity of any security instrument.

IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF DEMANDED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

DATED: August 1, 2025

/s/ Christopher D. Loizides
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*Counsel for Maria Margarita Aguilar
Martinez*